

FACEBOOK  
EXHIBIT A

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GIBSON, DUNN & CRUTCHER LLP  
Orin Snyder (*pro hac vice*)  
osnyder@gibsondunn.com  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: 212.351.4000  
Facsimile: 212.351.4035

GIBSON, DUNN & CRUTCHER LLP  
Deborah Stein (SBN 224570)  
dstein@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

Kristin A. Linsley (SBN 154148)  
klinsley@gibsondunn.com  
Martie Kutscher (SBN 302650)  
mkutscherclark@gibsondunn.com  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

Joshua S. Lipshutz (SBN 242557)  
jlipshutz@gibsondunn.com  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

*Attorneys for Defendant Facebook, Inc.,*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DEFENDANT FACEBOOK, INC.’S  
RESPONSES AND OBJECTIONS TO  
PLAINTIFFS’ FOURTH SET OF  
INTERROGATORIES**

### **OBJECTIONS TO DEFINITIONS**

1. Facebook incorporates by reference the responses and objections to Definitions and Instructions contained in its Responses and Objections to Plaintiffs' First, Second, and Third Sets of Interrogatories.

2. Facebook objects to Plaintiffs' definitions of "and" and "or" as unreasonable, inconsistent with the Federal Rules of Civil Procedure, vague, and grammatically incoherent. Facebook will interpret "and" and "or" in accordance with their ordinary, everyday meaning, which includes interpreting disjunctive terms disjunctively and conjunctive terms conjunctively.

3. Facebook objects to Plaintiffs' definition of "describe in detail" or "detailed description" on the ground that the definition makes the Interrogatories overly broad and unduly burdensome and imposes obligations that go beyond the requirements of the Federal and Local Rules. Facebook shall construe these terms as commonly and ordinarily understood. Facebook further objects to this definition to the extent it seeks information beyond relevant facts, including Facebook's analyses or opinions, which are appropriately sought through contention interrogatories, which are not appropriate or justified at this early stage.

4. Facebook objects to Plaintiffs' definition of "App" as vague, ambiguous, overbroad, and unduly burdensome on the ground that it includes any "application developed to utilize the core technologies of the Facebook social networking platform" without identifying or defining what the "core," rather than peripheral, technologies of Facebook's platform are or were at any given time. Facebook further objects to this definition as vague and ambiguous on the ground that Facebook cannot identify what any online applications are or were "developed to" do or presume the intent of any third parties that Facebook does not control.

5. Facebook objects to Plaintiffs' definition of "Business Partners" as vague, ambiguous, and overly broad to the extent it refers to entities with which Facebook "partnered" to "develop and integrate" Facebook "on a variety of devices and operating systems" without defining any of those terms. Facebook will construe "Business Partners" as referring to the

integration partners and/or device manufacturers with whom Facebook has entered into agreements that have been and/or will be produced in response to Request for Production No. 24.

6. Facebook objects to Plaintiffs’ definition of “Content and Information” as vague, ambiguous, overly broad, and unduly burdensome. While purporting to cite Facebook’s Statements of Rights and Responsibilities, Plaintiffs have expanded the scope of “Content and Information” to include 10 subcategories of information—including “thermal [and] olfactory” information—that are not derived from that definition. Facebook objects to this definition to the extent it purports to seek documents or information that is not relevant to Plaintiffs’ live claims and bears no relation to third-party application developers being granted access to “sensitive user information” in a manner that was not disclosed to users between 2009 and 2015, the disclosure of information to so-called “whitelisted” business partners, the sharing of “sensitive user information” with business partners pursuant to “data reciprocity agreements,” and/or the use of “sensitive user information” by third party application developers as a result of Facebook’s alleged failure to adopt effective policies or enforcement procedures governing the transmission and use of “sensitive user data.” *See* MTD Order, ECF No. 298, at 6-10. Facebook will construe this term as referring to “[i]nformation and content [Users] provide” as described in Facebook’s Data Policy, which is the sole category of user content and information relevant to Plaintiffs’ claims.

7. Facebook objects to Plaintiffs’ definition of “Database” as vague, ambiguous, overly broad, and unduly burdensome to the extent the term is meant to include “any” organized collection of information that is stored electronically, which, for example, could include any files on an individual Facebook employee’s computer. Facebook will construe this term as referring to enterprise-wide electronic collection of related data organized for ready access.

8. Facebook objects to Plaintiffs’ definition of “Data Analytics Infrastructure” as vague, ambiguous, overly broad, and unduly burdensome to the extent the term is meant to include all “services, applications, utilities and systems” used by Facebook, term that are, themselves, broad and undefined. “Systems,” for instance, could refer to any methodologies or

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Respectfully submitted,

**GIBSON, DUNN & CRUTCHER, LLP**

By: /s/ Deborah Stein

Orin Snyder (*pro hac vice*)

osnyder@gibsondunn.com

200 Park Avenue

New York, NY 10166-0193

Telephone: 212.351.4000

Facsimile: 212.351.4035

Deborah Stein (SBN 224570)

dstein@gibsondunn.com

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Los Angeles, CA 90071-3197

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Joshua S. Lipshutz (SBN 242557)

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1050 Connecticut Avenue, N.W.

Washington, DC 20036-5306

Telephone: 202.955.8500

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*Attorneys for Defendant Facebook, Inc.*